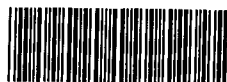




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

PFE ORIGINAL



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Lower Darby Creek Area Superfund Site Interview Summary Confidential Source #9



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INTERVIEW SUMMARY
Work Assignment ES002
Lower Darby Creek Area Site

(b) (6)

Prepared for:

U.S. Environmental Protection Agency
Region III
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

DASTON Corporation
210 West Washington Square
Suite 210
Philadelphia, PA 19106

Work Assignment Number:	ES002
Date Submitted:	March 25, 2002
Contract Number:	68-S3-01-01
EPA Work Assignment Manager:	Carlyn Prisk
Telephone Number:	(215) 814-2625
DASTON Work Assignment Manager:	(b) (4)
Telephone Number:	
Interviewer:	Tri-State Enterprise

(b) (6)

Name:

(b) (6)

WITNESS)

C/O Joseph F. O'Dea, Jr., Saul Ewing, LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102

Affiliation:

Former Employee/Tri-County Hauling

Telephone:

(215) 972-7109

Type of Interview:

In-Person

Date of Interview:

March 14, 2002

On March 14, 2002, the WITNESS was interviewed at (b) (6)

(b) (6) by (b) (4) of Tri-State Enterprise. The WITNESS was interviewed as part of the potentially responsible party search currently being conducted under Work Assignment NO. ES-002 involving the Lower Darby Creek Area, Delaware County, PA (the "Site"). This interview focused on the Folcroft Landfill (Folcroft). The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked and advised that the interview was voluntary. The WITNESS advised that he is represented by Joseph F. O'Dea, Jr. in this matter. This interview was not tape-recorded. The following individuals were also present during this interview.

- Brian Nishitani: Attorney for the United States Environmental Protection Agency, Region III (USEPA).
- Carlyn Prisk: Civil Investigator for the USEPA.
- Joseph F. O'Dea, Jr.: Attorney representing Waste Management Corporation and (b) (6)
- Cathleen Devlin: Attorney representing Waste Management Corporation.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was shown a map of the Site and this map was used throughout the interview.

The WITNESS was asked to explain his association with the site.

The WITNESS stated that he worked for Tri-County Hauling from (b) (6) as a waste-hauler/truck driver. He indicated that he drove both a roll-off truck and rear-end loader during the time he worked for Tri-County Hauling.

When asked to identify the dates that Tri-County Hauling was located at Folcroft and disposed of waste at Folcroft, the WITNESS stated that Tri-County Hauling was located at the following locations during the time period he worked for Tri-County Hauling:

- 61st and Passyunk Street.
- 70th Street in Philadelphia
- 58th Street in Philadelphia.

The WITNESS stated that he could not recall the specific dates Tri-County operated from each location.

The WITNESS indicated that Tri-County Hauling was located at the entrance to Folcroft when Folcroft was in operation and Tri-County Hauling disposed of all waste at Folcroft while Folcroft was in operation. The WITNESS stated that the owner/operator of Folcroft and Tri-County was Bernie McNichol and the General Manager of Folcroft and Tri-County Hauling was Ed Mullen.

The WITNESS was asked to identify the locations that he picked up waste from and transported and disposed of this waste at Folcroft. The WITNESS was also asked to describe the waste for each location. The WITNESS provided the following information:

- Mercy Fitzgerald Hospital: The WITNESS stated that he picked up a compactor container of unknown waste from this location on an on-call basis.
- Children's Hospital: The WITNESS stated that he picked up a compactor container from this location on a weekly basis.
- Temple Hospital: The WITNESS stated that he picked up a compactor container from this location.
- Presbyterian Hospital: The WITNESS stated that he picked up an open container and a compactor container from this location on a weekly basis.
- Miseracordia Hospital: The WITNESS stated that he picked up an open-top container and a compactor container at this location.

The WITNESS stated that all of the waste he picked up at the above hospitals consisted of filled plastic bags colored green, white and blue.

The WITNESS stated that he picked up waste from the following locations in a rear-end loader truck and transported this waste to Folcroft:

- Paoli Animal Hospital: Waste from trashcans of unknown type.
- Wyeth Labs: Waste from trashcans, floor sweepings and cafeteria waste.
- TV Guide: Waste from trashcans, containing old TV Guide magazines and cafeteria waste.

- Pennsylvania Electric Company, 23rd and Market: Trash can waste.
- Penn Tower: Contents of a 1-yard container of unknown waste.
- Philadelphia Electric on County Road: Glass and wire
- UPS in Ardmore: Paper and packaging material.
- Forester Inn in Ardmore: Trash can waste.
- Tile House in Ardmore: Trash can waste.
- Deegans Restaurant on 15th and Locust, Philadelphia: Trash can waste.
- Bradley's Restaurant on Juniper Street, Philadelphia: Trash can waste.
- Quachowitz Glass Company on Broad and Washington Streets in Philadelphia: Manufactured home windows.
- MAB Bruder: Compactor container containing bags with a powder that is used to mix with paint.
- Firestone Store in Ardmore: Trash can waste.
- K-Mart in Yeadon: Dumpster
- Acme in Chichester: Open container

When asked if he picked up waste at the Navy Yard, the WITNESS stated that he picked up a roll-off container from that location and described the waste as being old pipes.

When asked the names of other waste transporters that disposed of waste at Folcroft, the WITNESS provided the following names:

(The WITNESS stated that he was not sure of the spelling or complete names of these companies)

- Charles Crawley Waste Hauling
- Bernie McHugh
- McKarnen Waste
- Barratt Roofing
- General Electric Company: The WITNESS stated that General Electric had one 2.5-ton state body truck with wooden sides that disposed of an unknown waste at Folcroft.

When asked if he had ever observed the disposal of liquid waste at Folcroft, the WITNESS stated that he did observe a tanker truck disposing of liquid waste on one occasion. He indicated that the tanker caught fire and he assisted in bringing the truck driver to safety. The WITNESS stated that he could not recall the name of the driver or any names or markings on the truck. The WITNESS could not recall the approximate date this fire occurred.

When asked to describe how a truck entered Folcroft and what, if any, paper work was necessary to enter, the WITNESS stated there was a shack located at the entrance to Folcroft across the road from the Tri-County garage. The WITNESS stated that an employee of Folcroft was always in the shack and stopped all trucks entering Folcroft. For each truck entering Folcroft, a ticket was filled out by a Folcroft employee indicating the name of the company and the size of the truck. The WITNESS stated that all Tri-County trucks did not have to stop at this shack and were directed by the bulldozer operator at Folcroft to a location to dispose of their waste.

When asked the names of other individuals that worked for Tri-County Hauling or Folcroft, the WITNESS provided the following.

- John Lee
- Jim Barney
- Harry Pine
- James Bennett
- Sonny Maxwell
- Elwood Johnson
- Henry Sanders
- Joe Sanders

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(b) (6)